

EXHIBIT B

Joan Schulman – October 22, 2020

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
Master docket No. 18-MD-2865 (LAK)
3 Case Nos. 18-cv-09505

4 IN RE:)
)
)

5 CUSTOMS AND TAX ADMINISTRATION OF)
6 THE KINGDOM OF DENMARK (SKATTEFOR)
7 VALTNINGEN) TAX REFUND SCHEME)
LITIGATION,)
)
8)
9)
10)
11)
12)
13)

14 REMOTE VTC VIDEOTAPED DEPOSITION UNDER ORAL

15 EXAMINATION OF

16 JOAN SCHULMAN

17 DATE: October 22, 2020
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23
24

25 REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 THE WITNESS: Good. Thank you.

2 Wait, no, sorry.

3 MR. BLESSINGTON: Does anybody else
4 have any questions?

5 MR. BINDER: I do, John. Neil
6 Binder. Do you have a copy of the
7 document that I sent around earlier
8 today?

9 Mrs. Schulman, this will be two
10 minutes of your time. I just resent it
11 to you.

12 MR. BLESSINGTON: I got it, yeah.
13 Just pulling it up. Joan can see it.

14 MR. BINDER: Okay. Great.

15
16 EXAMINATION BY MR. BINDER:

17 Q So Mrs. Schulman, I'm Neil Binder.
18 I'm an attorney with Binder & Schwartz and we
19 represent ED&F Man Capital Markets, Limited.

20 A Okay.

21 Q So, in front of you is a document
22 with the Bates numbers LIND 314 through 316,
23 which is going to be marked as Exhibit 880.

24 A Okay.

25 MR. BINDER: Mark this as 880.

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1 (Whereupon the above mentioned was
2 marked for Identification.)

3 Q Do you see on the first page, that
4 that is a letter addressed to ED&F Man
5 Capital Markets, Limited?

6 A Not yet, but I will in a minute.

7 MR. BLESSINGTON: Hold on, Neil.

8 A Yes.

9 Q You testified earlier that you
10 never heard of ED&F Man.

11 Correct?

12 A Correct.

13 Q Okay. Have you ever spoken to
14 anyone at ED&F Man?

15 A I doubt it.

16 Q But not that you know of?

17 A Not that I know of at all.

18 Q And if you could, just scroll down
19 to the last page?

20 A Yes.

21 Q Do you see, there's a signature
22 there?

23 A Yes.

24 Q And that is -- you didn't sign
25 that.

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1 Correct?

2 A I don't think I did, no.

3 Q But your husband had authority to
4 sign documents like this for you?

5 A Yes.

6 Q Okay. And you believe that that's
7 your husband signing for you?

8 A I think so.

9 MR. BINDER: Thank you. I have no
10 other questions.

11 THE WITNESS: Okay.

12 MR. BLESSINGTON: I just have a few
13 quick questions.

14
15 EXAMINATION BY MR. BLESSINGTON:

16 Q Good morning, Mrs. Schulman?

17 A Yes.

18 Q You can look at the camera.

19 A I don't have to stare at the
20 screen.

21 Q Ms. Cahan showed you a bunch of
22 documents and, in fact, Mr. Binder, as well,
23 showed you one document, asking whether that
24 was your signature.

25 Do you recall that?